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From: Liz Thornberry <liz.thornberry@gmail.com>
Sent: Friday, September 23, 2022 1:27 PM
To: DCOZ - ZC Submissions (DCOZ)
Subject: Comment on Proposed Zoning Process

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Hello,

I write to give my feedback on the proposed changes to the DC zoning process that would require all zoning proposals to be evaluated through a racial justice and equity lens as part of the approval process.

As a historian of colonial and apartheid South Africa, I am keenly aware of the ways in which zoning has been used, both internationally and in DC, to create and perpetuate racial inequality. The Zoning Commission must indeed address this problem.

However, I am deeply concerned that the proposed changes will actually make the problem worse. As recent research in city planning has shown, zoning regulations that seek to increase public participation in the zoning process have had the unintended consequence of increasing the ability of powerful constituencies to block unwanted development (1). The same is true for regulations, such as environmental protection laws, that require individual scrutiny of each development project (2).

The Zoning Commission inarguably does have a crucial role to play in reducing racial inequality in DC. To achieve this goal, however, it must act proactively, rather than simply reacting to applications from individual developers. The Commission should take the initiative to rezone areas of the city--particularly in the Northwest--where restrictions on multiunit development keep housing prohibitively expensive for the majority of DC residents. Wealthy areas that are walkable from Metro or major bus lines should have their density zoning increased even further. Parking minimums should be abolished throughout the city, lowering the cost for entrepreneurs to own and operate physical businesses, and lowering the costs for new developments.

These changes will not, alone, solve the racial inequality that continues to plague the District. Other branches of city government must play important roles as well to ensure that all residents have equal access to high-quality education, well-paying jobs, affordable and accessible transportation, and a healthy living environment. However, the would move the city towards racial equity. The current proposals, although well intended, would very likely exacerbate the racial inequality in our city.

Sincerely,
Elizabeth Thornberry

Citations:

1. Marantz, N. J., & Ulibarri, N. (2022). The Tensions of Transparency in Urban and Environmental Planning. *Journal of Planning Education and Research*, 42(3), 401–412. <https://doi.org/10.1177/0739456X19827638>

2. O'Neill, Moira, et al. "Developing Policy from the Ground Up: Examining Entitlement in the Bay Area to Inform California's Housing Policy Debates." *Hastings Environmental Law Journal*, vol. 25, no. 1, Winter 2019, pp. 1-84. *HeinOnline*, <https://heinonline.org/HOL/P?h=hein.journals/haswnw25&i=2>.